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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JAMES K. MORRIS,
 Plaintiff,

vs.

FAIR COLLECTIONS & OUTSOURCING,
 INC.; INVITATION HOMES REALTY, LLC;
 EQUIFAX INFORMATION SERVICES, LLC;
 EXPERIAN INFORMATION SOLUTIONS,
 INC.; and TRANS UNION LLC,
 Defendants.

Case No. 2:22-cv-01987-CDS-VCF

STIPULATION TO AMEND COMPLAINT

Plaintiff, JAMES K. MORRIS, by and through counsel, Kevin L. Hernandez, Esq. of the law firm, Law Office of Kevin L. Hernandez, and Defendant, INVITATION HOMES REALTY, LLC, by and through Douglas D. Gerrard, Esq. of the law firm, Gerrard Cox Larsen, hereby stipulate and agree that:

1. 2018-1 IH Borrower LP (“Landlord”), named as such in that certain Rental Agreement entered into on April 22, 2019 (“Agreement”), with Plaintiff, James Morris, is a required party in this matter as described in FRCP 19(a)(1);

2. THR Property Management L.P. (“Management”), identified in the Agreement as “Property Manager”, is also a required party in this matter as described in FRCP 19(a)(1);

3. As such, Plaintiff shall be allowed to file a First Amended Complaint, naming 2018-1 IH Borrower LP and THR Property Management L.P. as party defendants;

4. Plaintiff shall file an Amended Complaint within 14 judicial days, as computed by FRCP 6, after the Notice of Entry of an Order granting this Stipulation;

5. This Court's Order Granting Motion to Set Aside Default Judgment (Doc. 35), which requires Invitation Homes Realty, LLC to file a response to Plaintiff's original Complaint no later than June 28, 2023, is extended 14 days, running from the filing of Plaintiff's Amended Complaint;

6. The Landlord's and Management's response to Plaintiff's Amended Complaint will be filed simultaneous with Invitation Homes Realty, LLC's response, as described in the preceding paragraph; and

7. Nothing in this Stipulation is intended to, or will, be construed as an admission or waiver of the claims and/or defenses of the parties.

Dated this 28th day of June, 2023.

LAW OFFICE OF KEVIN L. HERNANDEZ

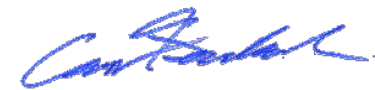
/s/ Kevin L. Hernandez, Esq.
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Dated this 28th day of June, 2023.

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Invitation Homes Realty, LLC

IT IS SO ORDERED.



Cam Ferenbach
 United States Magistrate Judge

DATED 6-30-2023

Gary Milne

From: Kevin Hernandez <Kevin@kevinhernandezlaw.com>
Sent: Wednesday, June 28, 2023 2:59 PM
To: Gary Milne
Subject: RE: morris v. invitation homes

Good to go. Thanks.

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From: Gary Milne <GMilne@gerrard-cox.com>
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Names revised. Split the difference in paragraphs 4 and 5 to 14 days in each.

Ok to add e-signature?